



## BIOLOGICAL AND BOTANICAL RESOURCES REPORT

### Wilkerson Parcel Project

# Wild Roots Ecological, LLC

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## 1. INTRODUCTION

### 1.1 Purpose and Scope

The proposed project involves property subdivision of a 2.86-acre parcel for future residential use. The property is located at 250 Panorama Drive, Bishop, California in the community of New Wilkerson, within the broader Inyo County. No physical activities (ground disturbance and/or vegetation disturbance) are proposed as part of this project scope. While no immediate physical ground disturbance or vegetation removal is proposed as a direct component of this administrative subdivision action, this Biological and Botanical Resources Report has been prepared to evaluate the potential indirect and future environmental impacts of residential development on the resulting parcels to biological and botanical resources within the project area in support of the California Environmental Quality Act (CEQA) review process. This report documents the results of desktop analysis and field surveys conducted to identify special-status species, special habitats, and other biological resources with potential to occur within or adjacent to the project area.

### 1.2 Project Location

The Proposed Project is located at 250 Panorama Drive within the community of New Wilkerson, approximately 4.5 miles south of downtown Bishop, Inyo County, California [1]. The project site centers at approximate geographic coordinates 37.2827° N latitude, -118.3894° W longitude (WGS 84 datum) at an elevation of approximately 4,475 feet above mean sea level (amsl).

Legal land description places the site within Section 06, Township 8 South, Range 33 East, Mount Diablo Meridian (MDM). The project location is depicted on the United States Geological Survey (USGS) Bishop, California 7.5-minute topographic quadrangle.

### 2.1 Project Overview

The proposed project involves an administrative property subdivision of a 2.86-acre parcel for future residential use located at 250 Panorama Drive, Bishop, California, Inyo County. No immediate ground disturbance is proposed as part of this subdivision action. This report evaluates the foreseeable maximum environmental development footprint of future residential lot buildouts that may be allowed under the proposed subdivision. The project area is pictured in Figures 1 & 2, below.

## 2.2 Project Area Characteristics

- Total parcel area: 2.86 acres
- Proposed disturbance footprint: None at this time (administrative subdivision only)
- Existing land use: Developed single-home residential parcel within New Wilkerson community
- Surrounding land uses: Residential, recreation, Big Sagebrush (*Artemisia tridentata*) shrubland alliance, agriculture and grazing.



**Figure 1:** Project area looking south from Panorama Drive.



**Figure 2:** Project area looking north from the southern property boundary adjacent to Collins Road.

## 3. REGULATORY FRAMEWORK

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### 3.1 Federal Regulations

#### 3.1.1 Federal Endangered Species Act (FESA)

Section 7 of the FESA requires federal agencies to consult with USFWS regarding actions that may affect federally listed threatened or endangered species or designated critical habitat. While this project does not have a federal nexus triggering formal Section 7 consultation, the USFWS IPaC database (Project Code 2026-0098593) was queried to identify federally listed species with potential to occur within the project area. Seven ESA-listed or proposed species were identified (see Section 4.1 and Table 1).

#### 3.1.2 Migratory Bird Treaty Act (MBTA)

The MBTA prohibits the take, killing, or possession of migratory birds without authorization. Any project activities resulting in take of migratory birds, including vegetation removal during the nesting season (February 1 through September 15), must comply with MBTA requirements. The IPaC review identified 12 Birds of Conservation Concern (BCC) and two eagle species with potential to occur within the project area (USFWS 2026; see Table 2).

#### 3.1.3 Bald and Golden Eagle Protection Act (BGEPA)

The Bald Eagle (*Haliaeetus leucocephalus*) and Golden Eagle (*Aquila chrysaetos*) are protected under the BGEPA (16 U.S.C. §§ 668–668d). This Act prohibits the "take" of eagles, their eggs, or their nests, which includes disturbances that may cause injury, decrease productivity, or result in nest abandonment. The USFWS IPaC database identified these species as having the potential to occur or forage within the regional vicinity of the project area (USFWS 2026). However, IPaC listing does not constitute confirmation of site presence. No active nests or individuals were observed within or immediately adjacent to the project area during the field reconnaissance surveys, and suitable nesting habitat (such as large cliff faces or massive mature trees near large bodies of water) is absent from the project footprint.

#### 3.1.4 Clean Water Act (Section 404 / Section 401)

No Waters of the United States or potentially jurisdictional features were identified within the project area. No Section 404 permits are anticipated to be required for this project. The IPaC review confirmed the absence of NWI wetlands within the project area.

### 3.2 State Regulations

#### 3.2.1 California Endangered Species Act (CESA)

CESA (Fish and Game Code Section 2050 et seq.) prohibits the take of plant and animal species listed by the state as endangered, threatened, or candidates for listing. Under CESA, "take" means to hunt, pursue, catch, capture, or kill. This report evaluates the potential for the project site to support state-listed species, specifically the state-threatened Swainson's hawk (*Buteo swainsoni*).

#### 3.2.2 California Environmental Quality Act (CEQA)

CEQA requires lead agencies to evaluate, disclose, avoid, or mitigate significant environmental impacts resulting from discretionary projects. Under CEQA Guidelines Section 15380, impacts to special-status species or rare vegetation alliances must be analyzed, even if those species are not formally listed under FESA or CESA. This report has been prepared to satisfy CEQA biological resource assessment requirements for the proposed project.

#### 3.2.3 California Fish and Game Code

- **Section 2080** – Prohibition on take of threatened and endangered species
- **Section 3503** – Protection of nesting birds
- **Section 3503.5** – Protection of raptors and their nests
- **Section 3513** – Migratory birds
- **Section 4150** – Protection of non-game mammals

#### 3.2.4 Native Plant Protection Act (NPPA)

The NPPA (Fish and Game Code Sections 1900-1913) protects rare, threatened, and endangered native plants in California. It allows CDFW to designate endangered and rare plants and prohibits the take of these species. The botanical survey conducted for this project was designed to satisfy NPPA assessment requirements.

#### 3.2.5 California Fully Protected Species

The California Fish and Game Code designates certain species as "fully protected" (Sections 3511, 4700, 5050, and 5515). The state cannot issue incidental take permits for these species except for necessary scientific research or recovery actions. No fully

protected species have the potential to nest or roost within the project footprint.

### 3.3 Local Regulations

#### 3.3.1 Inyo County General Plan

Inyo County General Plan outlines specific goals and policies aimed at managing, protecting, and enhancing natural resources within the county. The Conservation and Open Space Element contains the following guidelines relevant to biological resources:

- **Goal BIO-1** (Biological Diversity): Maintain and enhance biological diversity and healthy ecosystems throughout the County.
- **Policy BIO-1.2** (Preservation of Riparian Habitat and Wetlands): Mandates that important riparian areas and wetlands, as identified by the County, shall be preserved and protected for biological resource values.
- **Policy BIO-1.3** (Restoration of Biodiversity): Encourages the restoration of degraded biological communities.

The proposed project at 250 Panorama Drive is consistent with these goals. A site-specific field assessment confirmed that the project footprint is confined to highly disturbed *Artemisia tridentata* Alliance. No riparian habitats, jurisdictional wetlands, or critical wildlife movement corridors are present within or immediately adjacent to the project footprint. Implementation of standard seasonal avoidance measures for nesting raptors ensures the project will not conflict with the County's mandate to protect local biological diversity.

#### 3.3.2 Inyo County Code / Local Ordinances

**Tree Preservation Ordinances:** Inyo County does not maintain a native tree preservation ordinance that regulates the removal of upland desert vegetation or non-native landscaping trees on private residential parcels (Inyo County 2026).

**Habitat Conservation Plans (HCPs):** The project site is not located within the boundaries of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or any other local, regional, or state-approved habitat conservation plan (Inyo County 2026).

## 4. METHODS

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### 4.1 Environmental Setting & Site Characterization

The project area's environmental baseline was established through a tiered field assessment strategy. An initial, informal reconnaissance site visit was conducted by Erin Clifford, Principal Ecologist of Wild Roots Ecological LLC, on March 31, 2026, to determine habitat characterizations and identify overriding ecological considerations. Following subsequent desktop analysis, a formal, protocol-level field survey was executed on May 2, 2026. During this formal May 2, 2026 effort, comprehensive botanical, general wildlife, nesting bird, woodpecker, and species-specific habitat suitability surveys were conducted concurrently.

The project area is situated on Goodale-Cartago complex soils (Map Unit Symbol [MUS] 202; moist, 5 to 15 percent slopes). The natural portions of the project area are comprised of Big sagebrush scrub (*Artemisia tridentata*) shrubland alliance, specifically the *Artemisia tridentata* – *Ericameria nauseosa* association, which is heavily degraded by non-native annual cheatgrass and red brome understories. The portion of the property adjacent to the existing residence on-site is comprised of Anthropogenic Vegetation (Developed / Landscaped), including a variety of mature cultivated landscape species such as introduced non-native shade trees, managed fruit orchard varieties, and introduced decorative ornamental shrubs.

### 4.2 Desktop Biological Constraints Analysis

A comprehensive desktop review was conducted to identify special-status species and sensitive biological resources with potential to occur within the project area and surrounding region. Sources consulted included:

- California Natural Diversity Database (CNDDDB), California Department of Fish and Wildlife – queried March 1, 2026
- California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants – queried March 1, 2026
- U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) – queried June 4, 2026
- California Department of Fish and Wildlife special-status species lists
- National Wetlands Inventory (NWI) mapping
- USDA Web Soil Survey
- USGS 7.5-minute topographic mapping
- Aerial imagery review (Google Earth, NAIP)
- Regional vegetation and habitat mapping

#### 4.2.1 USFWS IPaC Review

The USFWS IPaC database was queried on June 4, 2026, for the project location in Inyo County, California (Project Code 2026-0098593, Reno Fish and Wildlife Office). The IPaC review identified seven ESA-listed or proposed species, two eagle species protected under BGEPA, and twelve Birds of Conservation Concern (BCC) under MBTA that may occur within the boundary of the proposed project. No critical habitat was identified within the project area under the jurisdiction of the Reno FWSO, and no NWI wetlands were identified within the project area. Results of the IPaC review are incorporated into Sections 6.2 and 6.3.

#### 4.2.2 CNDDDB & CNPS Review

CNDDDB and CNPS were queried on March 1, 2026; CNDDDB query results were clipped to a 5-mile radius of the project area. CNDDDB wildlife species documented within this radius include 2 birds, 4 fish, and 4 mammals; 8 botanical species are documented within this radius. CNDDDB review results are presented in Tables 1 (wildlife) and 2 (plants) with habitat suitability and occurrence potential assessments for each species evaluated relative to conditions observed during field surveys. 2 additional botanical species were included in the CNPS query results. See section 6.1 below for more details on these query results.

### 4.3 Field Surveys

#### 4.3.1 Survey Dates and Conditions

An initial field reconnaissance survey was conducted by Erin Clifford on March 31, 2026 to determine habitat characteristics, inform desktop analysis and additional survey requirements.

Erin Clifford conducted formal wildlife, nesting bird and raptor nest surveys, and botanical surveys on June 2, 2026. On-site conditions were mostly sunny, 65 degrees Fahrenheit, with 3-8 mph south/south-east winds.

#### 4.3.2 Botanical Surveys

Botanical surveys were floristic in nature. Surveys were conducted to coincide with peak blooming periods for target botanical species. Surveys were conducted using the intuitive controlled survey method, combining systematic habitat coverage with targeted investigation of microhabitats most likely to support special-status botanical species. Survey coverage was achieved using a series of meandering transects throughout the project area. The surveyor traversed the project area on foot, pausing frequently to examine individual plants, substrate conditions, and microhabitat features. All plant taxa encountered within the project area

were identified to the taxonomic level necessary to determine rarity and listing status. Plant nomenclature follows Plant nomenclature follows the Jepson Flora Project (Jepson eFlora, continuously updated) and the USDA PLANTS Database. Special attention was given to disturbed margins, drainage swales, and sandy substrates, which had the highest potential to support special-status species, including sagebrush loeflingia (*Loeflingia squarrosa* var. *artemisiarum*).

#### **4.3.3 Wildlife Surveys**

General wildlife surveys were conducted concurrently with botanical surveys. Methods included visual and auditory detection of wildlife species, evaluation of sign (tracks, scat, burrows, nests), and opportunistic observation. Incidental wildlife species observations are documented in Section 6.2.1, below.

#### **4.3.4 Nesting Bird and Raptor Surveys**

Nesting bird surveys were conducted during nesting season (February 1 – September 15); visual and auditory surveys for nesting birds and raptors were conducted in accordance with CDFW and USFWS guidelines. Surveys covered all suitable nesting habitat within the project area and a 500-foot buffer for raptors. No active raptor or songbird nests or nesting bird activity were detected. Incidental avian species observations are documented in Section 6.3.1, below.

### **4.4 Special-Status Species Evaluation Criteria**

Species-specific potential-to-occur determinations were based on: (1) presence of suitable habitat within or adjacent to the project area; (2) proximity of known occurrences from database records; and (3) geographic range relative to the project location. Potential-to-occur ratings used in this report are defined as follows:

- High – Suitable habitat present; species known from the vicinity.
- Moderate – Marginally suitable habitat present; species known from the region.
- Low – Unsuitable or marginal habitat; species not expected but cannot be excluded.
- None – No suitable habitat; species not expected to occur.

## 5. ENVIRONMENTAL SETTING

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### 5.1 Regional Setting

The project is located within the Great Basin/Mojave Desert interface, in the Owens Valley ecoregion, at an elevation of approximately 4,475 feet amsl. Bishop, CA has a cold desert climate characterized by hot summers and cold winters with extreme aridity and very low annual precipitation, averaging 5.18 inches per year, and with an average of 6 inches annual snowfall. The Owens Valley is broad and deep, and escarped by the Sierra Nevada Mountains to the west, and the White and Inyo Mountains to the east.

### 5.2 Local Setting

The project area is located within the developed neighborhood of New Wilkerson, in Bishop, California. Site conditions observed during reconnaissance surveys consisted of low slope (2-4%), previously disturbed Big Sagebrush (*Artemisia tridentata*) Shrubland Alliance and Anthropogenic Vegetation (Developed / Landscaped).

### 5.3 Vegetation Communities and Land Cover

The natural portions of the project area are comprised of Big Sagebrush (*Artemisia tridentata*) shrubland alliance, specifically the *Artemisia tridentata* – *Ericameria nauseosa* association, which is heavily degraded by non-native annual cheatgrass and red brome understories. The portion of the property adjacent to the existing residence on-site is comprised of Anthropogenic Vegetation (Developed / Landscaped), including a variety of mature cultivated landscape species such as introduced non-native shade trees, managed fruit orchard varieties, and introduced decorative ornamental shrubs.

### 5.4 Wildlife Habitat

Although the understory of the Big Sagebrush shrubland alliance component of the project area is degraded by non-native annual cheatgrass (*Bromus tectorum*) and red brome (*Bromus madritensis* ssp. *rubens*), the sagebrush and rubber rabbitbrush (*Ericameria nauseosa*) provide potential habitat for wildlife. These shrubs offer potentially suitable protective cover, nesting sites, and foraging resources for small mammals, reptiles, and resident or migratory desert birds.

The developed and landscaped portion of the site contains mature introduced shade trees, fruit trees, and ornamental shrubs. These features artificially enhance the site's structural complexity, providing potential nesting habitat for urban-adapted avian species, perching sites for raptors, and seasonal foraging resources (such as nectar and fruit) for pollinators, birds, and small mammals.

The project area is located within a developed rural-residential neighborhood, limiting its function as a primary regional wildlife corridor. Fencing, roads, and residential activity in New Wilkerson act as localized barriers to the movement of large mammals. However, the site does not present a complete barrier to wildlife. It remains accessible to highly mobile species, such as birds and bats, and has the potential to serve as a low-density matrix that smaller, ground-dwelling wildlife (e.g., rodents and reptiles) can navigate to access more contiguous habitat in the Owens Valley.

### 5.5 Jurisdictional Waters and Wetlands

No drainages, wetlands, riparian vegetation, vernal pools, or other features indicative of potential Waters of the United States or Waters of the State were observed within or adjacent to the project area during field surveys. The project area consists of previously disturbed upland desert scrub with no evidence of surface or subsurface hydrology. No hydrologic features were observed on-site– however, a separate hydrology report is being completed for this project.

## 6. SPECIAL-STATUS SPECIES DESKTOP ANALYSIS

### 6.1 CNDDDB and CNPS Botanical Species Analysis

The following table summarizes all CNNDDB botanical species documented within 5-miles of the Project area. Each species is evaluated for habitat suitability and occurrence potential within the project area.

| CNDDDB Botanical Species Documented within 5 Miles & All CNPS Query Species |                                  |                   |                       |                                                                                                                                             |                                                    |                                                          |                                                                                                                                                                                                                 |
|-----------------------------------------------------------------------------|----------------------------------|-------------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Common Name                                                                 | Scientific Name                  | Regulatory Status | # of Occurrences      | Suitable Habitat Type(s)                                                                                                                    | Habitat Suitability (High/Moderate/Low/Unsuitable) | Occurrence Potential (High/Medium/Low/Unlikely to Occur) | Further Analysis Required (Yes/No) - Rationale                                                                                                                                                                  |
| broadleaf pondweed                                                          | <i>Stuckenia striata</i>         | 2B.3              | 1                     | Submerged aquatic beds within Freshwater Marsh macro-group, lakes, and active slow-moving streams.                                          | Unsuitable                                         | Unlikely to Occur                                        | No- No suitable habitat present within project area.                                                                                                                                                            |
| fiddleleaf hawksbeard                                                       | <i>Crepis runcinata</i>          | 2B.2              | 2                     | Mesic alkali meadows, seeps, and flats, frequently associated with <i>Distichlis spicata</i> or <i>Chrysothamnus albidus</i> alliances.     | Unsuitable                                         | Unlikely to Occur                                        | No- No suitable habitat present within project area.                                                                                                                                                            |
| frog's-bit buttercup                                                        | <i>Ranunculus hydrocharoides</i> | 2B.2              | 0 (CNPS query result) | Freshwater marshes and swamps                                                                                                               | Unsuitable                                         | Unlikely to Occur                                        | No- No suitable habitat present within project area.                                                                                                                                                            |
| hot springs fimbriatylis                                                    | <i>Fimbristylis thermalis</i>    | 2B.2              | 1                     | Thermal springs, hot seeps, and mineralized moist soils near thermal outflows.                                                              | Unsuitable                                         | Unlikely to Occur                                        | No- No suitable habitat present within project area.                                                                                                                                                            |
| Inyo County star-tulip                                                      | <i>Calochortus excavatus</i>     | 1B.1              | 5                     | Moist alkaline meadows and open margins of saltgrass ( <i>Distichlis spicata</i> ) complexes. Requires shallow groundwater tables.          | Unsuitable                                         | Unlikely to Occur                                        | No- No suitable habitat present within project area.                                                                                                                                                            |
| Nevada oryctes                                                              | <i>Oryctes nevadensis</i>        | 2B.1              | 7                     | Loose sand accumulations and small dune structures within desert scrub and big sagebrush ( <i>Artemisia tridentata</i> ) vegetation blocks. | Low                                                | Low                                                      | No. While disturbed sagebrush is present on-site, the soil profile lacks the deep, localized shifting sand dunes or wind-blown sand accumulations this small annual requires. High historical grading and urban |

|                           |                                                      |      |                       |                                                                                                                                                                    |            |                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------|------------------------------------------------------|------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           |                                                      |      |                       |                                                                                                                                                                    |            |                   | fragmentation nearby make colonization unlikely.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Owens Valley checkerbloom | <i>Sidalcea covillei</i>                             | 1B.1 | 6                     | Seasonally or permanently moist alkali meadows floor within saltgrass ( <i>Distichlis spicata</i> ) and wildrye ( <i>Leymus cinereus</i> ) zones.                  | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Parish's popcornflower    | <i>Plagiobothrys parishii</i>                        | 1B.1 | 0 (CNPS) query result | Great Basin scrub, Joshua tree woodland; Wet, alkaline soil around desert springs, mud flats                                                                       | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| pinyon rockcress          | <i>Boechera dispar</i>                               | 2B.3 | 1                     | Rocky outcrops, gravelly slopes, and carbonate canyon walls within Pinyon-Juniper Woodland or upper Chaparral alliances.                                           | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| sagebrush loeflingia      | <i>Loeflingia squarrosa</i> var. <i>artemisiarum</i> | 2B.2 | 1                     | Openings in big sagebrush ( <i>Artemisia tridentata</i> ) scrub or rabbitbrush ( <i>Ericameria nauseosa</i> ) alliances. Prefers sandy, loose, or disturbed soils. | Moderate   | Moderate          | Yes (Completed)- Initial desktop analysis of the property's disturbed sagebrush scrub and sandy soils initially indicated a Moderate Potential to occur, triggering the need for focused fieldwork. A targeted, seasonally timed botanical survey and flora inventory was subsequently conducted across the project footprint during the peak blooming window (April–June). Sagebrush loeflingia was not detected on-site and is determined to be absent. No physical impacts will occur; no further surveys or map conditions are required. See Section <b>X.X</b> (Survey Results) for a comprehensive list of |

|  |  |  |  |  |  |  |                                           |
|--|--|--|--|--|--|--|-------------------------------------------|
|  |  |  |  |  |  |  | incidental botanical species<br>observed. |
|--|--|--|--|--|--|--|-------------------------------------------|

## 6.2 CNDDDB Wildlife Species Analysis

The following table summarizes all CNDDDB wildlife species documented within 5-miles of the project area. Each species is evaluated for habitat suitability and occurrence potential within the project area.

| Wildlife Species Documented within 5 Miles |                           |                   |                  |                                                                                                                                                                                                                               |                                                    |                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------|---------------------------|-------------------|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Common Name                                | Scientific Name           | Regulatory Status | # of Occurrences | Suitable Habitat Type(s)                                                                                                                                                                                                      | Habitat Suitability (High/Moderate/Low/Unsuitable) | Occurrence Potential (High/Moderate/Low/Unlikely to Occur) | Further Analysis Required (Yes/No) - Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Birds</b>                               |                           |                   |                  |                                                                                                                                                                                                                               |                                                    |                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| American goshawk                           | <i>Astur atricapillus</i> | SSC               | 1                | Nest in large tracts of either coniferous, deciduous, or mixed-pine forests, preferring mature forests with large trees on moderate slopes with open understories—nest trees are typically among the largest in the vicinity. | Unsuitable                                         | Unlikely to Occur                                          | No- While large trees are present within the project area the site is located within a developed residential neighborhood. American goshawk is a highly secretive, human-averse, interior-forest raptor that is highly sensitive to human disturbance, noise, and habitat fragmentation. This species is considered unlikely to occur due to unsuitable habitat within the project area.                                                                                                                                                                                                                                  |
| Swainson's hawk                            | <i>Buteo swainsoni</i>    | ST                | 1                | Nest within scattered stands of trees near agricultural fields and grasslands. Forage in open habitats such as hay and alfalfa fields, pastures, grain crops, and row crops.                                                  | Moderate                                           | Moderate                                                   | Yes- A CNDDDB occurrence for this species is documented within 5 miles of the project area and mature nesting trees are present on-site. While the site is located in a neighborhood, there are agricultural fields located within a few miles that are suitable for foraging. Because this project is an administrative subdivision with no immediate physical impacts, no immediate surveys are required at this time. However, because the subdivision facilitates future development, a mitigation condition must be applied to the map requiring formal SHTAC protocol surveys within a 0.5-mile radius prior to any |

|                                           |                                          |            |   |                                                                                                                                                                                                                |            |                   |                                                                                                                                                                                                                                                                            |
|-------------------------------------------|------------------------------------------|------------|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                           |                                          |            |   |                                                                                                                                                                                                                |            |                   | future ground-disturbing activities, tree removal, or development on the resulting lots.                                                                                                                                                                                   |
| <b>Fish</b>                               |                                          |            |   |                                                                                                                                                                                                                |            |                   |                                                                                                                                                                                                                                                                            |
| Amargosa speckled dace                    | <i>Rhinichthys nevadensis nevadensis</i> | SSC        | 3 | Pool-like habitat with deep, slow-moving water.                                                                                                                                                                | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                                                                                       |
| Owens pupfish                             | <i>Cyprinodon radiosus</i>               | FE, SE, FP | 2 | Spring pools, sloughs, irrigation ditches, swamps, and flooded pastures; currently confined to 5 populations in the Owens Valley                                                                               | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                                                                                       |
| Owens sucker                              | <i>Catostomus fumeiventris</i>           | SSC        | 2 | Widely distributed in streams, lakes, reservoirs, and rivers of the Owens River watershed.                                                                                                                     | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                                                                                       |
| Owens tui chub                            | <i>Siphateles bicolor snyderi</i>        | FE, SE     | 1 | Historically distributed throughout the standing waters and low gradient reaches of the Owens River and its larger tributaries.                                                                                | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                                                                                       |
| <b>Mammals</b>                            |                                          |            |   |                                                                                                                                                                                                                |            |                   |                                                                                                                                                                                                                                                                            |
| Owens Valley vole                         | <i>Microtus californicus vallicola</i>   | SSC        | 1 | Spring-fed freshwater marshes, rush/sedge meadows, native meadows, riparian vegetation, and ungrazed irrigated pastures.                                                                                       | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                                                                                       |
| Sierra Nevada red fox - Sierra Nevada DPS | <i>Vulpes vulpes necator pop. 2</i>      | FE, ST     | 1 | The fox primarily lives in mountain habitats above 9,000 feet in elevation; they have only been documented as low as 6,000 feet                                                                                | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                                                                                       |
| Townsend's big-eared bat                  | <i>Corynorhinus townsendii</i>           | SSC        | 3 | Found in all but subalpine and alpine habitats. Roost in caves, mines, tunnels, buildings, or other human-made structures exhibiting cave-like structures. Hibernation sites are cold, but not below freezing; | Low        | Low               | Three CNDDDB occurrences for Townsend's big-eared bat are documented within 5 miles of the project area. No caves, mines, tunnels, abandoned buildings, bridges, or deep rock crevices are present within or adjacent to the project footprint and the disturbed sagebrush |

|           |                  |            |   |                                                                                                                                                         |            |                   |                                                                                                                                                                                                                                                                                                                                              |
|-----------|------------------|------------|---|---------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           |                  |            |   | maternity roosts are warm.                                                                                                                              |            |                   | scrub present on-site provides low-quality potential foraging habitat for this species. Because no suitable habitat features exist to support the species, Townsend's big-eared bat is considered absent from the project area. No impacts will occur, and no additional focused or pre-construction surveys are warranted for this species. |
| wolverine | <i>Gulo gulo</i> | FT, ST, FP | 1 | Occur primarily in boreal and tundra ecosystems in Douglas-fir/tanoak, Jeffrey pine, red fir, mixed conifer, and lodgepole pine habitats in California. | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                                                                                                                                                         |

## 6.3 USFWS IPaC ESA Species Analysis

The following table summarizes all ESA-listed, proposed, and candidate species identified through the IPaC review (Project Code 2026-0098593). Each species is evaluated for habitat suitability and occurrence potential within the project area.

| Common Name                      | Scientific Name                                        | Fed. Status         | Critical Habitat             | Habitat                                                                            | Further Analysis Required (Yes/No) - Rationale                                                                                 |
|----------------------------------|--------------------------------------------------------|---------------------|------------------------------|------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| North American Wolverine         | <i>Gulo gulo luscus</i>                                | Threatened          | None designated              | boreal/subalpine montane forest >9,000 ft. Project area at ~4,475 ft.              | No- No suitable habitat present within project area.                                                                           |
| Southwestern Willow Flycatcher   | <i>Empidonax traillii extimus</i>                      | Endangered          | Designated — not overlapping | Riparian willow/cottonwood thickets.                                               | No- No suitable habitat present within project area.                                                                           |
| Yellow-billed Cuckoo (W. US DPS) | <i>Coccyzus americanus</i>                             | Threatened          | Designated — not overlapping | Dense riparian woodland. No suitable habitat present. Unlikely to occur.           | No- No suitable habitat present within project area.                                                                           |
| Owens Pupfish                    | <i>Cyprinodon radiosus</i>                             | Endangered          | None designated              | Spring pools and sloughs — currently 5 Owens Valley populations.                   | No- No suitable habitat present within project area.                                                                           |
| Owens Tui Chub                   | <i>Gila bicolor ssp. snyderi</i>                       | Endangered          | Designated — not overlapping | Standing/low-gradient Owens River reaches.                                         | No- No suitable habitat present within project area.                                                                           |
| Monarch Butterfly                | <i>Danaus plexippus</i>                                | Proposed Threatened | Proposed — not overlapping   | Overwinter in coastal CA; milkweed ( <i>Asclepias</i> spp.) required for breeding. | Yes- While no suitable roosting habitat is present on-site, botanical surveys will determine the presence/absence of milkweed. |
| Fish Slough Milk-vetch           | <i>Astragalus lentiginosus</i> var. <i>piscinensis</i> | Threatened          | Designated — not overlapping | Alkaline soils in Fish Slough, Inyo/Mono Co.                                       | No- No suitable habitat present within project area.                                                                           |

### 6.3 Migratory Birds, BCC Species, and Eagles (IPaC)

The following table summarizes all Birds of Conservation Concern (BCC) and eagle species identified through the IPaC review. Breeding season windows and habitat suitability relative to the project area are provided for each species.

| Common Name            | Scientific Name                  | BCC Status          | Breeding Season | Habitat                                                                                                                                                                                                                                                                                          | Habitat Suitability (High/Moderate/Low/Unsuitable) | Occurrence Potential (High/Moderate/Low/Unlikely to Occur) | Further Analysis Required (Yes/No) - Rationale                                                                                                                                                                                                                                                                                                        |
|------------------------|----------------------------------|---------------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bald Eagle             | <i>Haliaeetus leucocephalus</i>  | Non-BCC (Eagle Act) | Dec 1–Aug 31    | Generally nest in forested areas adjacent to large bodies of water and avoid heavily developed areas. When foraging will often congregate around fish processing plants, dumps, and below dams. Prefer perching on tall, mature trees with broad views of the surroundings.                      | Unsuitable                                         | Unlikely to Occur                                          | No suitable nesting or foraging habitat present within the project area or within 500-feet to support this species. However, BGEPA protection applies; nesting bird/raptor surveys will determine the presence/absence of this species and/or raptor nests within 500 feet of the project area.                                                       |
| Golden Eagle           | <i>Aquila chrysaetos</i>         | Non-BCC (Eagle Act) | Jan 1–Aug 31    | Nest on cliffs and steep escarpments generally with broad views of the surroundings. Live in open/semiopen native vegetation types (grassland, chapparal, shrubland, forest, etc.) throughout the Northern Hemisphere, generally avoiding developed areas and uninterrupted stretches of forest. | Low                                                | Unlikely to Occur                                          | No suitable nesting or foraging habitat present within the project area to support this species; Moderately suitable foraging habitat present within 500-feet of the project area. BGEPA protection applies; nesting bird/raptor surveys will determine the presence/absence of this species and/or raptor nests within 500 feet of the project area. |
| American Avocet        | <i>Recurvirostra americana</i>   | BCC — BCR           | Apr 21–Aug 10   | Associated with alkali wetlands; not expected on-site.                                                                                                                                                                                                                                           | Unsuitable                                         | Unlikely to Occur                                          | No- No suitable habitat present within project area.                                                                                                                                                                                                                                                                                                  |
| American White Pelican | <i>Pelecanus erythrorhynchos</i> | BCC — BCR           | Apr 1–Aug 31    | Associated with large open water; not expected on-site.                                                                                                                                                                                                                                          | Unsuitable                                         | Unlikely to Occur                                          | No- No suitable habitat present within project area.                                                                                                                                                                                                                                                                                                  |
| Bobolink               | <i>Dolichonyx oryzivorus</i>     | BCC — Range wide    | May 20–Jul 31   | Grassland/meadow habitat; not expected on-site.                                                                                                                                                                                                                                                  | Unsuitable                                         | Unlikely to Occur                                          | No- No suitable habitat present within project area.                                                                                                                                                                                                                                                                                                  |

|                        |                                  |                  |               |                                                                                                                                                                                                                                                                                                                      |            |                   |                                                                                                                                                                                                     |
|------------------------|----------------------------------|------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| California Gull        | <i>Larus californicus</i>        | BCC — Range wide | Mar 1–Jul 31  | Associated with coastal areas, pastures, scrublands, and garbage dumps. Breed and nest in colonies on islands and levees in lakes and rivers and commute to forage.                                                                                                                                                  | Low        | Unlikely to Occur | No- While marginally suitable forage habitat is present within project area this species is unlikely to occur.                                                                                      |
| Calliope Hummingbird   | <i>Selasphorus calliope</i>      | BCC — Range wide | May 1–Aug 15  | Breed in montane shrub/riparian habitats typically between 4,000-11,000 feet). Typically nest on the branch of an evergreen tree. low suitability on-site.                                                                                                                                                           | Low        | Low               | No- Low habitat suitability and low occurrence potential.                                                                                                                                           |
| Cassin's Finch         | <i>Haemorhous cassinii</i>       | BCC — Range wide | May 15–Jul 15 | Often live in mature lodgepole and ponderosa pine forests, but are also found in Jeffrey pine, Douglas-fir, limber pine, Engelmann spruce, subalpine fir, grand fir, red fir, pinyon pine, bristlecone pine, and aspen habitats. Occasionally known to breed in open sagebrush scrub with scattered western juniper. | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                |
| Northern Harrier       | <i>Circus hudsonius</i>          | BCC — BCR        | Apr 1–Sep 15  | Breed in marshes, lightly grazed meadows, fields, tundra, dry upland prairies, drained marshlands, high-desert shrubsteppe, and riverside woodlands. Western populations most often breed in dry upland habitats. Nest on the ground next to a dense clump of vegetation.                                            | Moderate   | Moderate          | Yes- Sagebrush scrub habitat present within the project area is consistent with breeding habitat for western populations. Nesting bird surveys will determine the presence/absence of this species. |
| Olive-sided Flycatcher | <i>Contopus cooperi</i>          | BCC — Range wide | May 20–Aug 31 | Open woodland habitat. Forage in meadows, rivers, streams, partially logged areas, recent burn areas, beaver ponds, bogs, and muskegs.                                                                                                                                                                               | Unsuitable | Unlikely to Occur | No- No suitable habitat present within project area.                                                                                                                                                |
| Pinyon Jay             | <i>Gymnorhinus cyanocephalus</i> | BCC — Range wide | Feb 15–Jul 15 | Pinyon-juniper, chaparral, and scrub-oak woodlands. Will occasionally forage within sagebrush, bitterbrush and grassland habitats.                                                                                                                                                                                   | Low        | Low               | No- Low habitat suitability and low occurrence potential.                                                                                                                                           |
| Rufous Hummingbird     | <i>Selasphorus rufus</i>         | BCC — Range wide | Apr 15–Jul 15 | Breed in a variety of habitats, including open or shrubby areas, forest openings, yards, parks, forests, thickets, swamps, and meadows.                                                                                                                                                                              | Low        | Low               | No- Low habitat suitability and low occurrence potential.                                                                                                                                           |

## 7. RESULTS

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### 7.1 Botanical Survey Results

Two vegetation communities were observed on-site during survey efforts, Big Sagebrush Scrub, and Anthropogenic Vegetation (described in greater detail below). No special-status botanical species were observed during survey efforts.

#### 7.1.1 Vegetation Communities

The project site is composed of two primary vegetation mapping units. Acreages and classification details adhering to the Manual of California Vegetation (MCV) standards are detailed below. All botanical species observed on-site during survey efforts are included in Section 6.1.2, below.

##### Big Sagebrush Scrub (*Artemisia tridentata*) Shrubland Alliance

- **MCV Alliance Code:** 35.110.00 / **Association:** *Artemisia tridentata* – *Ericameria nauseosa*
- **Approximate Total Acreage On-Site:** 2 acres
- **Vegetation Layer Dynamics:** The shrub canopy is dominated by basin big sagebrush (*Artemisia tridentata* ssp. *tridentata*) and rubber rabbitbrush (*Ericameria nauseosa*). Shrub canopy cover ranges between 15-20%.
- **Understory Characterization:** The herbaceous layer is heavily altered and dominated by invasive, non-native annual grasses, specifically cheatgrass (*Bromus tectorum*). Native associated understory herbs are sparse but include cushion cryptantha (*Cryptantha circumscissa*) and wingnut cryptantha (*Cryptantha pterocarya*).

##### Anthropogenic Vegetation (Developed / Landscaped)

- **MCV/Land Cover Code:** Anthropogenic (91.100.00)
- **Approximate Total Acreage On-Site:** 0.86 acre
- **Description:** This mapping unit encompasses the existing single-family residence, driveway, and managed buffer zone. Vegetation features a variety of mature cultivated landscaping species, non-native shade trees such as black locust (*Robinia pseudoacacia*), orchard fruit trees, and bird-of-paradise shrub (*Caesalpinia gilliesii*). This area lacks native structural wildlife value but provides potential nesting canopy for common synanthropic avian species.

### 7.1.2 Botanical Species Observed

No special-status botanical species were observed during survey efforts. All botanical species encountered are listed in the table below.

| Common Name              | Scientific Name                                        | Family                | USDA Code |
|--------------------------|--------------------------------------------------------|-----------------------|-----------|
| Bailey's buckwheat       | <i>Eriogonum baileyi</i>                               | <i>Polygonaceae</i>   | ERBA      |
| basin big sagebrush      | <i>Artemisia tridentata ssp. tridentata</i>            | <i>Asteraceae</i>     | ARTRT     |
| Bermudagrass             | <i>Cynodon dactylon</i>                                | <i>Poaceae</i>        | CYDA      |
| bird-of-paradise shrub   | <i>Caesalpinia gilliesii (Erythrostemon gilliesii)</i> | <i>Fabaceae</i>       | CAGI      |
| black locust             | <i>Robinia pseudoacacia</i>                            | <i>Fabaceae</i>       | ROPS      |
| brownplume wirelettuce   | <i>Stephanomeria pauciflora</i>                        | <i>Asteraceae</i>     | STPA4     |
| cheatgrass               | <i>Bromus tectorum</i>                                 | <i>Poaceae</i>        | BRTE      |
| common pussypaws         | <i>Cistanthe monandra (Calyptridium monandrum)</i>     | <i>Montiaceae</i>     | CIMO4     |
| cushion cryptantha       | <i>Cryptantha circumscissa</i>                         | <i>Boraginaceae</i>   | CRCI2     |
| desert bitterbrush       | <i>Purshia tridentata</i>                              | <i>Rosaceae</i>       | PUTR2     |
| desert needlegrass       | <i>Achnatherum speciosum (Panostipa speciosa)</i>      | <i>Poaceae</i>        | ACSP2     |
| desert wishbone-bush     | <i>Mirabilis laevis</i>                                | <i>Nyctaginaceae</i>  | MILA6     |
| Eastern Mojave buckwheat | <i>Eriogonum fasciculatum</i>                          | <i>Polygonaceae</i>   | ERFA2     |
| fivehorn smotherweed     | <i>Bassia hyssopifolia</i>                             | <i>Chenopodiaceae</i> | BAHY      |
| flatbud pricklypoppy     | <i>Argemone munita</i>                                 | <i>Paperavaceae</i>   | ARMU      |
| flatspine bur ragweed    | <i>Ambrosia acanthicarpa</i>                           | <i>Asteraceae</i>     | AMAC2     |
| Fremont cottonwood       | <i>Populus fremontii</i>                               | <i>Salicaceae</i>     | POFR2     |
| horehound                | <i>Marrubium vulgare</i>                               | <i>Lamiaceae</i>      | MAVU      |
| Nevada jointfir          | <i>Ephedra nevadensis</i>                              | <i>Ephedraceae</i>    | EPNE      |
| prickly lettuce          | <i>Lactuca serriola</i>                                | <i>Asteraceae</i>     | LASE      |
| red brome                | <i>Bromus rubens</i>                                   | <i>Poaceae</i>        | BRRU2     |
| redstem stork's bill     | <i>Erodium cicutarium</i>                              | <i>Geraniaceae</i>    | ERCI6     |
| rubber rabbitbrush       | <i>Ericameria nauseosa</i>                             | <i>Asteraceae</i>     | ERNA10    |
| showy gilia              | <i>Gilia cana</i>                                      | <i>Polemoniaceae</i>  | GICA3     |
| Siberian elm             | <i>Ulmus pumila</i>                                    | <i>Ulmaceae</i>       | ULPU      |
| sixweeks fescue          | <i>Vulpia octoflora (Festuca octoflora)</i>            | <i>Poaceae</i>        | VUOC      |
| smooth desertdandelion   | <i>Malacothrix glabrata</i>                            | <i>Asteraceae</i>     | MAGL3     |
| squirreltail             | <i>Elymus elymoides</i>                                | <i>Poaceae</i>        | ELEL5     |
| tall tumbled mustard     | <i>Sisymbrium altissimum</i>                           | <i>Brassicaceae</i>   | SIAL2     |
| whitedaisy tidytips      | <i>Layia glandulosa</i>                                | <i>Asteraceae</i>     | LAGL5     |
| whitestem blazingstar    | <i>Mentzelia albicaulis</i>                            | <i>Loasaceae</i>      | MEAL6     |

|                      |                                                            |                      |      |
|----------------------|------------------------------------------------------------|----------------------|------|
| Wilcox's woollystar  | <i>Eriastrum wilcoxii</i>                                  | <i>Polemoniaceae</i> | ERWI |
| wingnut cryptantha   | <i>Cryptantha pterocarya</i>                               | <i>Boraginaceae</i>  | CRPT |
| <b>Row highlight</b> | <b>Meaning</b>                                             |                      |      |
| Orange/salmon        | Non-native AND invasive in Great Basin/NV context          |                      |      |
| Yellow               | Non-native but not considered invasive in wildland context |                      |      |

## 7.2 Wildlife Survey Results

No wildlife species of concern were observed during survey efforts.

### 7.2.1 Wildlife Species Observed

Only one non-avian wildlife species was observed during survey efforts, the black-tailed jackrabbit (*Lepus californicus*), which has no Federal or State designations.

## 7.3 Nesting Bird and Raptor Survey Results

No active raptor or songbird nests or nesting bird activity (carrying food, alarm calls, nest building) were detected during survey efforts.

### 7.3.1 Avian Species Observed

All avian species observed (heard or seen) during survey efforts are listed below.

| Common Name             | Scientific name               | Family         | Federal status | State status | MBTA          | Nativity   |
|-------------------------|-------------------------------|----------------|----------------|--------------|---------------|------------|
| Bewick's wren           | <i>Thryomanes bewickii</i>    | Troglodytidae  | None           | SSC          | Protected     | Native     |
| Song sparrow            | <i>Melospiza melodia</i>      | Passerellidae  | None           | None         | Protected     | Native     |
| Eurasian collared-dove  | <i>Streptopelia decaocto</i>  | Columbidae     | None           | None         | Not protected | Introduced |
| Indigo bunting          | <i>Passerina cyanea</i>       | Cardinalidae   | None           | None         | Protected     | Native     |
| Lesser goldfinch        | <i>Spinus psaltria</i>        | Fringillidae   | None           | None         | Protected     | Native     |
| California quail        | <i>Callipepla californica</i> | Odontophoridae | None           | None         | Not protected | Native     |
| House finch             | <i>Haemorhous mexicanus</i>   | Fringillidae   | None           | None         | Protected     | Native     |
| House sparrow           | <i>Passer domesticus</i>      | Passeridae     | None           | None         | Not protected | Introduced |
| Ash-throated flycatcher | <i>Myiarchus cinerascens</i>  | Tyrannidae     | None           | None         | Protected     | Native     |
| Mountain bluebird       | <i>Sialia currucoides</i>     | Turdidae       | None           | None         | Protected     | Native     |
| Common raven            | <i>Corvus corax</i>           | Corvidae       | None           | None         | Protected     | Native     |
| Western kingbird        | <i>Tyrannus verticalis</i>    | Tyrannidae     | None           | None         | Protected     | Native     |
| Say's phoebe            | <i>Sayornis saya</i>          | Tyrannidae     | None           | None         | Protected     | Native     |
| Plumbeous vireo         | <i>Vireo plumbeus</i>         | Vireonidae     | None           | None         | Protected     | Native     |

## 8. IMPACT ASSESSMENT

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### 8.1 CEQA Significance Thresholds

Under CEQA, a project would have a significant impact on biological resources if it would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS
- Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan

### 8.2 Direct Impacts

The proposed project is an administrative property subdivision involving no immediate ground disturbance, vegetation removal, grading, or construction. No direct physical impacts to biological resources are associated with recordation of the subdivision map. As documented in Section 6, no special-status plant or wildlife species were detected within the project area during field surveys conducted on June 2, 2026. No sensitive natural communities, jurisdictional waters, wetlands, or riparian habitat are present within the project area. No active raptor or songbird nests were detected during nesting bird and raptor surveys within the project area and 500-foot buffer.

Accordingly, no direct significant impacts to biological resources are anticipated as a result of the proposed administrative subdivision.

### 8.3 Indirect Impacts

Future residential development of the parcels resulting from this subdivision has the potential to result in indirect impacts to biological resources, including temporary and permanent habitat loss within the Big Sagebrush Scrub Alliance, introduction or spread of invasive non-native plant species through ground disturbance, increased light, noise, and human activity associated with residential use, and potential disturbance to nesting birds and raptors if construction activities occur during the nesting season (February 1 through September 15).

These indirect impacts are speculative at this stage, as no development plans have been submitted and no construction is proposed as part of this action. Future development of the resulting lots will require separate discretionary review and biological resource evaluation at the time development applications are submitted. The nesting bird mitigation measure described in Section 9.1 is recommended as a condition of the subdivision map to ensure MBTA and Fish and Game Code compliance during any future ground-disturbing activities.

No indirect impacts to jurisdictional waters, riparian habitat, or wetlands are anticipated, as none are present within or adjacent to the project area.

## 8.4 Impact Summary

Anticipated project impacts are summarized below.

| Resource                           | Type of Impact                                                                                                 | Area Affected            | Significance Before Mitigation                                                                                            | Mitigation Measure                          | Significance After Mitigation         |
|------------------------------------|----------------------------------------------------------------------------------------------------------------|--------------------------|---------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|---------------------------------------|
| Big Sagebrush Scrub Alliance       | Direct — None at this time; indirect potential through future development                                      | Up to 2.0 acres (future) | Less than significant                                                                                                     | Section 9.3 Nesting Bird Mitigation Measure | Less than significant                 |
| Special-status plant species       | None — no special-status plants detected                                                                       | None                     | Less than significant                                                                                                     | None required                               | Less than significant                 |
| Special-status wildlife species    | None direct; potential indirect for Swainson's hawk & eagles through future tree removal during nesting season | None at this time        | Potentially significant (future)                                                                                          | Section 9.1 Nesting Bird Mitigation Measure | Less than significant with mitigation |
| Nesting birds and raptors          | None — no active nests detected; potential indirect from future construction during nesting season             | None at this time        | Potentially significant (future)                                                                                          | Section 9.1 Nesting Bird Mitigation Measure | Less than significant with mitigation |
| Jurisdictional waters and wetlands |                                                                                                                |                          | Hydrology report and associated analysis is being conducted separately from this Biological and Botanical Species Report. |                                             |                                       |
| Wildlife movement corridors        | None — site embedded in residential neighborhood; no corridors present                                         | None                     | Less than significant                                                                                                     | None required                               | Less than significant                 |

## 9. AVOIDANCE AND MINIMIZATION MEASURES

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Due to the absence of special status botanical and wildlife species on-site, no botanical or wildlife mitigation measures are recommended for this project. While no active raptor or songbird nests or nesting bird activity was observed, the following Nesting Bird Mitigation Measure is recommended for potential future project activities beyond the scope of this analysis, involving on-site ground disturbance or vegetation disturbance. Please note that if any potential future vegetation/ground disturbance activities are scheduled to occur outside of the nesting bird season (February 1 through September 15) the following mitigation measure would not apply.

### 9.1 Nesting Bird Mitigation Measure

- If future project activities involving ground disturbance or vegetation disturbance are proposed during the nesting bird season (February 1 through September 15), a pre-construction nesting bird survey shall be conducted by a qualified biologist no more than 3 days prior to initiation of vegetation removal or ground disturbance. If active nests are identified, a qualified biologist shall establish appropriate buffer zones around active nests. Construction activities shall not encroach within established buffers until the nest is confirmed inactive by the project biologist. Alternatively, a biologist will be present on-site to monitor the nest during project activities to ensure that no nest disturbance occurs.

## 10. REFERENCES

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- **All About Birds.** (n.d.). *American Goshawk Overview*. Cornell Lab of Ornithology. Retrieved June 4, 2026, from [https://www.allaboutbirds.org/guide/American\\_Goshawk](https://www.allaboutbirds.org/guide/American_Goshawk)
  - **All About Birds.** (n.d.). *Cassin's Finch Overview*. Cornell Lab of Ornithology. Retrieved June 4, 2026, from [https://www.allaboutbirds.org/guide/Cassins\\_Finch/](https://www.allaboutbirds.org/guide/Cassins_Finch/)
  - [https://www.allaboutbirds.org/guide/Northern\\_Harrier/](https://www.allaboutbirds.org/guide/Northern_Harrier/)
  - [https://www.allaboutbirds.org/guide/Olive-sided\\_Flycatcher/](https://www.allaboutbirds.org/guide/Olive-sided_Flycatcher/)
  - [https://www.allaboutbirds.org/guide/Pinyon\\_Jay/overview](https://www.allaboutbirds.org/guide/Pinyon_Jay/overview)
  - **All About Birds.** (n.d.). *Swainson's Hawk Overview*. Cornell Lab of Ornithology. Retrieved June 4, 2026, from [https://www.allaboutbirds.org/guide/Swainsons\\_hawk](https://www.allaboutbirds.org/guide/Swainsons_hawk)
  - **Bald and Golden Eagle Protection Act (BGEPA).** (1940). 16 U.S.C. §§ 668–668d, as amended.
  - **The Calflora Database.** (n.d.). *Calflora: Information on California plants for education, research and conservation* [Web Application]. Berkeley, California. Accessed April–June, 2026. [calflora.org](http://calflora.org)
  - **California Code of Regulations (C.C.R.).** (2026). *Title 14, Division 6, Chapter 3: Guidelines for the Implementation of the California Environmental Quality Act (§§ 15000–15387)*. State of California.
  - **California Department of Fish and Wildlife (CDFW).** (2018). *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. State of California, Natural Resources Agency.
  - **California Department of Fish and Wildlife (CDFW).** (n.d.). *Amargosa Speckled Dace (*Rhinichthys osculus nevadensis*)*. Inland Deserts Region (Region 6) Desert Fishes. Retrieved June 4, 2026, from <https://wildlife.ca.gov/Regions/6/Desert-Fishes/Amargosa-Speckled-Dace>
  - **California Department of Fish and Wildlife (CDFW).** (n.d.). *California Natural Diversity Database (CNDDDB)*. State of California, Natural Resources Agency. Biogeographic Data Branch. Accessed March 1, 2026. <https://wildlife.ca.gov/Data/CNDDDB>
  - **California Department of Fish and Wildlife (CDFW).** (n.d.). *Owens Pupfish (*Cyprinodon radiosus*)*. Inland Deserts Region (Region 6) Desert Fishes. Retrieved June 4, 2026, from <https://wildlife.ca.gov/Regions/6/Desert-Fishes/Owens-pupfish>
  - **California Department of Fish and Wildlife (CDFW).** (n.d.). *Owens Valley Vole Research*. Inland Deserts Region (Region 6) Lands Program. Retrieved June 4, 2026, from <https://wildlife.ca.gov/Regions/6/Lands/Owens-Valley-Vole-Research>
  - **California Department of Fish and Wildlife (CDFW).** (n.d.). *Species Account: Owens Sucker (*Catostomus fumeiventris*)*. California Natural Diversity Database (CNDDDB). Retrieved June 4, 2026, from <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=104359&inline>
  - **California Department of Fish and Wildlife (CDFW).** (n.d.). *Species Account: Townsend's Big-Eared Bat (*Corynorhinus townsendii*)*. California Natural Diversity Database (CNDDDB). Retrieved June 4, 2026, from <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2347>
  - **California Environmental Quality Act (CEQA).** (1970). California Public Resources Code, Section 21000 et seq.
  - **California Fish and Game Code.** (2026). California Fish and Game Code §§ 86, 1900–1913 (Native Plant Protection Act), 2050–2115.5 (California Endangered Species Act), 3503, 3503.5, 3511, 3513, 4150, 4700, 5050, 5515. State of California.
  - **California Native Plant Society (CNPS).** (2026). *A Manual of California Vegetation*, Online Edition. Sacramento, California. Accessed May 2026. [cnps.org](http://cnps.org)
  - **Clean Water Act (CWA).** (1972). 33 U.S.C. § 1251 et seq., as amended.
  - **Federal Endangered Species Act (FESA).** (1973). 16 U.S.C. § 1531 et seq., as amended.
  - **Inyo County.** (2001). *Inyo County General Plan: Conservation and Open Space Element*. Inyo County Planning Department. Independence, California.
  - **Inyo County.** (2026). *Inyo County Code: Title 17 (Subdivisions) and Title 18 (Zoning)*. Accessed June 2026.
  - **Jepson Flora Project.** (2026). *Jepson eFlora*. University and Jepson Herbaria, University of California, Berkeley. Accessed May 2026. [berkeley.edu](http://berkeley.edu)
  - **Migratory Bird Treaty Act (MBTA).** (1918). 16 U.S.C. §§ 703–712, as amended.
  - **Natural Resources Conservation Service (NRCS).** (2026). *Web Soil Survey*. United States Department of Agriculture (USDA). Retrieved June 4, 2026, from <https://websoilsurvey.nrcs.usda.gov/app/>
  - **Swainson's Hawk Technical Advisory Committee (TAC).** (1994). *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley*.
  - **U.S. Fish and Wildlife Service (USFWS).** (2026). *Information for Planning and Consultation (IPaC) System Online Regulatory Resource*. Project Code: 2026-0098593, Reno Fish and Wildlife Office. Retrieved June 4, 2026, from [fws.gov](http://fws.gov)
  - **U.S. Fish and Wildlife Service (USFWS).** (n.d.). *Sierra Nevada Red Fox (*Vulpes vulpes necator*)*. ECOS Species Profile. Retrieved June 4, 2026, from <https://www.fws.gov/species/sierra-nevada-red-fox-vulpes-vulpes-necator>
-